

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:18-cv-05774-AT
)	
NANCY ZAK,)	
CLAUD CLARK III,)	
ECOVEST CAPITAL, INC.,)	
ALAN N. SOLON,)	
ROBERT M. MCCULLOUGH,)	
RALPH R. TEAL JR.,)	
)	
Defendants.)	

JOINT MOTION FOR ENTRY OF FINAL JUDGMENT
AGAINST DEFENDANT NANCY ZAK

Plaintiff United States and Defendant Nancy Zak have reached a settlement agreement regarding all of the claims asserted against Ms. Zak in this case, have negotiated the terms of a consent injunction, and have filed a stipulation for entry of final judgment (ECF No. 266). Accordingly, the United States and Ms. Zak respectfully request that, pursuant to Fed. R. Civ. P. 54(b) and 65(d), the Court enter the attached (proposed) final judgment against Ms. Zak.

This motion, if granted, will significantly narrow the issues for trial, streamline discovery, and allow Ms. Zak to save the expense and time involved in further litigation.

Because there is no just reason for delay, the United States and Ms. Zak respectfully request that the Court grant this motion and enter final judgment against Ms. Zak. The attached memorandum of law provides further support for this request.

Dated: March 25, 2021

Respectfully submitted,

/s/ Erin R. Hines

ERIN R. HINES
Florida Bar No. 44175
CHARLES P. HURLEY
District of Columbia Bar No. 490793
GREGORY VAN HOEY
Maryland Bar
RICHARD G. ROSE
District of Columbia Bar No. 493454
HARRIS J. PHILLIPS
Massachusetts Bar No. 675603
ERIC M. ABERG
District of Columbia Bar No. 1044111
ANN T. PORTER
New York Bar No. 5412218
LAUREN A. DARWIT
Illinois Bar No: 6323788
Trial Attorneys, Tax Division
U.S. Department of Justice
P.O. Box 7238, Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 514-2901

DAVID A. HUBBERT
Acting Assistant Attorney General

/s/ Nathan E. Clukey

NATHAN E. CLUKEY
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8949
nclukey@Sidley.com
(*pro hac vice*)

MATTHEW D. LERNER
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8983
mlerner@Sidley.com
(*pro hac vice*)

LAURA C. MULHERIN
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, D.C. 20005
(202) 736-8437
lmulherin@sidley.com
(*pro hac vice*)

KURT R. ERSKINE
Acting United States Attorney
NEELI BEN-DAVID
Assistant U.S. Attorney
Georgia Bar No. 049788

Attorneys for Plaintiff United States

S. FENN LITTLE, JR.
S. FENN LITTLE, JR., PC
1490 Mecaslin St., NW
Atlanta, GA 30309
(404) 815-3100
fennlaw@fennlittle.com
Georgia Bar No. 454360

Attorneys for Defendant Nancy Zak